

EXHIBIT E

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

GEORGIA STATE CONFERENCE OF) No.
NAACP, et al.,) 1:21-CV-5338-ELB-SCJ-
) SDG
Plaintiff,)
)
vs.)
)
STATE OF GEORGIA, et al.,)
)
Defendant.)
_____)

VIDEOTAPED 30(b)(6) and 30(b)(1) DEPOSITION OF
LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE
(MS. GINA WRIGHT)
January 26, 2023
9:17 a.m.
18 Capitol Square SW
Atlanta, Georgia

Reported by: Marcella Daughtry, RPR, RMR
CA CSR 14315
GA No. 6595-1471-3597-5424

1 point, but I don't recall a specific e-mail with him.

2 Q The same reasons why you didn't really e-mail
3 the Congressional map?

4 A Yes.

5 Q Okay. Do you -- did -- I think you told me
6 that Chairman Kennedy provided you with specific
7 instructions about how the lines of the map should be
8 drawn?

9 A Say that one more time. I'm sorry.

10 Q Sure.

11 Did Chairman Kennedy provide you with specific
12 instructions about how the lines of the State Senate map
13 should be drawn?

14 A No.

15 Q Did you receive any specific instructions about
16 how the lines of the State Senate map should be drawn?

17 A Initially, no.

18 Q How did you make a determination about how to
19 draw the lines for the State Senate map?

20 A That was a -- basically a -- call it a blind
21 map, but it was a map, just a starting point map to
22 address the population changes in the state and make
23 adjustments to the districts as they were, to try and
24 have a starting point, a discussion map to -- to start
25 with.

1 you about Mr. Tyson's role?

2 A I believe so.

3 Q So Mr. Kennedy -- pardon me. Chairman Kennedy
4 sees the blind map, and then what happens? Does he
5 direct you to make changes to it?

6 A That being a starting point map, then yes, we
7 began to work within it to make adjustments for whatever
8 requests people wanted to try and modify the map, however
9 he wanted to try to best accommodate requests and things
10 that were brought to him.

11 Q And you had a lot of conversations with him?

12 A Yes.

13 Q A lot of conversations about modifying the
14 blind map?

15 A We did have conversations about modifying it,
16 yes.

17 Q Were those conversations ever in person?

18 A Yes.

19 Q Were they mostly in person?

20 A Yes.

21 Q When you had those conversations, was the map
22 projected onto a screen?

23 A Not necessarily.

24 Q But sometimes?

25 A Sometimes.

1 Q When you had the conversations when the map was
2 projected onto the screen, was it within Maptitude?

3 A If I'm looking at the map, it would have been
4 in Maptitude.

5 Q Okay. And you know how to use Maptitude?

6 A Yes.

7 Q Was data projected onto the screen?

8 A Sometimes it may have been. Not all the time.

9 Q Why would you look at a map without any data
10 related to it?

11 A You are just reviewing the geography. You
12 wouldn't necessarily be looking at the data. You are
13 looking at the composition of districts, the counties,
14 precincts and things.

15 Q When data was projected onto the screen, what
16 type of data was it?

17 A Typically, our data would include the total
18 population, the deviation, the percent deviation, voting
19 age population. Most of the fields that you see on our
20 population summary reports would be also included on
21 there, as well as political data.

22 Q I recall that there's data related to the race
23 of the population on those summary reports.

24 A Correct.

25 Q Was data related to the race of the populations

1 projected onto the screen?

2 A It could have been sometimes.

3 Q Most of the time?

4 A Most of the time. We usually projected all the
5 race data that we would use on the reports, as well as
6 the political data that they were reviewing. So both
7 together.

8 Q Was that data relevant to you making -- I'll
9 rephrase.

10 Did Chairman Kennedy consider that data when
11 making instructions about how to draw the lines?

12 A I would assume he did. I don't know what
13 Chairman Kennedy considered.

14 Q Was it sort of a collaborative conversation or
15 was it really just Chairman Kennedy giving you
16 instructions and you following them?

17 A Can you explain what you mean by that?

18 Q Yeah. I can imagine that Chairman Kennedy told
19 you you need to move this line in southeast Georgia and
20 then you did it. Or Chairman Kennedy could say, what
21 would happen if I moved -- you moved this line in
22 southeast Georgia? You could say, well, Chairman, this
23 or that.

24 A I'd say it's more like the second scenario.

25 Q Okay. What type of questions did he ask you?

1 Kennedy, Mr. Tyson and Ms. Paradise and other senators?

2 A The changes, I think, came at the request of
3 the senator, and then Chairman Kennedy authorized to try
4 and see if we could do what he had requested.

5 Q At the request of the senator, what senator are
6 you referring to?

7 A Senator Rhett.

8 Q So there was the map that was published first?

9 A Uh-huh.

10 Q And then Senator Rhett requested changes?

11 A Uh-huh.

12 Q And as a consequence of that, you made changes?

13 A Yes.

14 Q And then another map was published?

15 A Yes.

16 Q Were there any other changes requested?

17 A I cannot recall. That one stands out. I
18 remember doing that one. I don't recall if there were
19 others in that draft.

20 Q Why does it stand out?

21 A I have drawn a lot of maps, so...

22 Q Yeah. So why does that one stand out?

23 A Because in committee, I remember there was
24 discussion over the change, that that was in the
25 committee meeting, so that one sticks out. That may have

1 been the only one that went into that final version
2 because other -- other changes might have gone into the
3 other version, the first presented version before we got
4 to that, but there were members, you know, putting
5 changes in.

6 That one just jumps out at me. That may have
7 been the only one that went into that last version.

8 Q Did you speak with anyone else in addition to
9 the people you referred to for any reason about the State
10 Senate map?

11 A I probably spoke with a lot of senators
12 regarding that map.

13 Q Right. Right. Okay.

14 A So I don't want to list all 56 of the
15 members --

16 Q Yeah.

17 A -- that were here then, but I spoke with a lot
18 of members at that point, from the time -- especially
19 when the map was made public, those that requested
20 things.

21 Q Did you speak with anyone in the House about
22 drawing the State Senate map?

23 A I don't think so.

24 Q Did you speak with anyone outside of the
25 General Assembly about drawing the State Senate map?

1 look like?

2 A There was a lot of input everywhere.

3 Q And it was hard to look at all of it?

4 A Yes.

5 Q Right. You weren't able to look at all of it?

6 A I looked at a lot of it but not all of it.

7 Q Yeah. There was a lot you didn't look at?

8 A I don't know that I'd say there was a lot I
9 didn't look at.

10 Q Okay.

11 A But I did watch or attend every public hearing.

12 Q Okay. We have just been talking about the
13 State Senate map, and you described a blind -- I'm going
14 to call it a blind map process. Does that make sense if
15 I said it that way?

16 A Sure.

17 Q Yeah. I should back up. What was your role in
18 drawing the State House map which Governor Kemp signed
19 into law?

20 A It was the same as the House, or as the Senate
21 and Congressional.

22 Q Okay. And did you use the same blind map
23 process to draw the State House map?

24 A Yes.

25 Q Was Brian Knight involved at all in drawing the

1 Q Well, so -- sure. Let me rephrase.

2 You referred to having a working session with
3 Chairman Kennedy, Mr. Tyson, Ms. Paradise about the State
4 Senate map. Am I recalling that?

5 A Right. Well, we would have had several
6 meetings where we discussed the map. There wasn't one
7 session where we had other multiple senators involved at
8 the same time that I recall. So the Senate was a little
9 different in that respect.

10 Q You met with Chairman Rich regarding the State
11 Senate map?

12 A Yes.

13 Q Was it the same type of process that you had
14 with Senator Kennedy, where you had a blind map and then
15 you reviewed it with her?

16 A Yes.

17 Q And then she, as the sponsor of the map, would
18 either direct you to make changes or bring in other
19 members of the House who would make directions for
20 changes?

21 A Yes. It was my understanding both chairmen
22 were meeting with members and had opened up office time
23 and meeting time to take input from the members about the
24 map and their districts. And I don't know how many
25 members each of them met with, but they did have those

1 meetings and that frame of reference. So that when we
2 met together, they could use those meetings and the input
3 they received from members to make adjustments if the --
4 if the draft didn't look -- if they felt like this member
5 had requested this and we weren't -- if we could
6 accommodate things, we would try to accommodate those
7 things.

8 Q But you weren't involved in those meetings?

9 A I was not.

10 Q Was anyone in your office involved in those
11 meetings?

12 A No.

13 Q You just knew they existed?

14 A Right.

15 Q Would Chairman Rich mention them to you?

16 A Yes.

17 Q Sometimes specific meetings?

18 A Maybe.

19 Q Yeah.

20 We've been going about an hour, I think. Would
21 this be a good time to maybe take a 15-minute break?

22 A I'm -- whatever.

23 THE WITNESS: Patrick?

24 MR. JAUGSTETTER: Sure.

25 MR. CANTER: Thank you.

1 received directions from -- sorry, I'll rephrase.

2 You mentioned earlier that with regards to the
3 Senate map, you received directions on how to draw the
4 lines from -- either directly from Chairman Kennedy or
5 through Chairman Kennedy from other senators. Is that
6 basically right?

7 A Yes.

8 Q And it was the same process with the State
9 House map but with Chairman Rich, not Chairman Kennedy?

10 A Yes.

11 Q What was your process for receiving directions
12 on how to change the lines with regards to the
13 Congressional map?

14 A Well, I think we talked about the meeting,
15 jointly meeting with them, so same type of thing. Input
16 from whatever they had, conversations or whatnot. There
17 were also considerations, of course, from things we had
18 heard from public hearings and other things to try and
19 incorporate into those maps, so those decisions were made
20 in coordination with all of that together.

21 Q Did you use a blind map for the Congressional
22 map -- sorry, let me rephrase.

23 A Yeah.

24 Q You mentioned -- that's fair.

25 You had mentioned creating a blind Senate map

1 same thing?

2 A Right. The fewer the splits, the easier it
3 would be for them to assign voters, especially under a
4 compressed time frame.

5 Q Got it. I understand that's especially the
6 case with precinct splits?

7 A Yes.

8 Q As part of your analysis of the maps, what did
9 you do to confirm that they were in compliance with the
10 Voting Rights Act?

11 A So compliance with the Voting Rights Act is a
12 legal opinion, so my work on drawing the map would
13 create -- try and maintain districts that we had
14 previously had that were districts that had been
15 majority-minority population districts. We try not to
16 reduce the number that we had before, and I would try to
17 make sure that what we were drawing, to the best of my
18 ability, continued that, if possible, but then I would
19 also ask them to have those reviewed by counsel for that
20 compliance.

21 Q So would it be fair to say that as a nonlawyer,
22 you tried your best to ensure compliance, but ultimately
23 that wasn't a determination you were making?

24 A True.

25 Q Okay. And the way you tried your best was to

1 Q So is there racial data at the block level?

2 A Yes.

3 Q All right. Is there any other type of demo --
4 data at the block level?

5 A So when we build our precinct layer, we do
6 allocate the election data to the block level, so we have
7 that political data at that level. It's estimating,
8 based on the demographics in there, based on registered
9 voter demographics kind of corresponds the two and
10 allocates down to that level. So we do have estimate
11 political data at the block level when we do this.

12 Q When you are drawing a map and you are looking
13 at the block level --

14 A Uh-huh.

15 Q -- is data reflected on the screen?

16 A Yes.

17 Q And is the estimated election data on the
18 screen with the other data?

19 A Yes.

20 Q You agree that the line we're looking at here
21 splits through the precinct, right?

22 A At the time, Newton County was considering
23 precinct changes. We were working with several -- their
24 elections office, and we had a draft precinct layer that
25 they were considering, so it's possible that I referred

1 Q Yeah. Okay.

2 And then Chairman Rich came and provided
3 direction, either directly to you, or Chairman Rich spoke
4 to other members of the House and they provided direction
5 to you through Chairman Rich?

6 A Yes.

7 Q Am I missing anything about people who provided
8 direction to you about how to draw this House district?

9 A I'm not sure what you mean.

10 Q Are there other people that directed you on how
11 to draw the House plan that I haven't mentioned already?

12 A Counsel was involved in consulting on -- on the
13 drawing of the maps as well.

14 Q Anyone else other than your counsel or those
15 that I've mentioned?

16 A Not that I can recall.

17 Q When you are drawing at the House level, are
18 you more often looking at the block layer?

19 A It would depend on which part of the state you
20 were in. In the more rural parts of the state, as you
21 can see on the map, the districts are larger --

22 Q Sure.

23 A -- and made up of whole counties. So in those
24 cases, it's probably more county and precinct based in
25 terms of what you use.

1 Census data until the time when all three of the final
2 maps were published, so the maps that ultimately were
3 passed by Governor Kemp became public. So this is after
4 you --

5 A Can I ask you to clarify what you mean by a
6 "block equivalency file" to make sure we're on the same
7 page?

8 Q Yeah. So it's a spreadsheet that request --
9 that reflects block data.

10 A Like block with a district assignment?

11 Q Correct.

12 A Okay. Just making sure we're talking about the
13 same thing.

14 So during the process of the draft maps coming
15 out and being made available, yes, I did receive requests
16 for block equivalency files.

17 Q From whom?

18 A I know that Shalamar Parham asked for them.
19 And there -- I don't know if there were other people who
20 did, but those -- I know she communicated directly with
21 me. So I don't know if there were others. There may
22 have been, but I know she did.

23 Q Do you know why?

24 A Do I know why she wanted them?

25 Q Yeah.

1 A I figured she was going to re-create those in
2 her software or their office. She worked for the House
3 Democratic Caucus, so I figured that's what they would be
4 using them for.

5 Q Did anyone else ask for block equivalency
6 files?

7 A I don't recollect anyone else, but that could
8 have gone to other staff as well.

9 Q Other staff you mean in the LCRO?

10 A Yes.

11 Q So Mr. Knight?

12 A It could have -- any requests would come
13 through our office manager, and then she would hand them
14 or give them to staff --

15 Q Okay.

16 A -- to handle.

17 Q So it could have gone to Mr. Knight?

18 A Could have.

19 Q Could have gone to Mr. O'Connor?

20 A Could have. I would think if it was an
21 e-mailed request, it would have been provided already in
22 the documents.

23 Q What do you mean by that? Sorry.

24 A The way the -- all the information that was
25 discovery, all those documents, if there was a request

1 Q And when you answer that, is that just within
2 the redistricting period or is that even after the maps
3 were published?

4 A Even after. I mean, requests don't come to me
5 and then to them, so they -- like I said, they come
6 through our office manager. If someone asks for some
7 information, it could have been fielded out to anyone in
8 our office to provide the answer to that.

9 Q You mentioned that Ms. Shalamar?

10 A Shalamar Parham.

11 Q Yeah, Ms. Shalamar asked for block equivalency
12 data?

13 A Yes.

14 Q Did you give it to her?

15 A Yes.

16 Q Did she have any follow-up questions?

17 A No.

18 Q Can you recall providing block equivalency data
19 to anyone else?

20 A She's the only particular individual I recall
21 providing that or asking for that file.

22 Q So generally, do you recall other people asking
23 for block equivalency data?

24 A What is the distinction in the question?

25 Q Because you said particularly, and so I'm

1 A Well, as I mentioned earlier, the inclusion of
2 an educational video, that was actually my idea. I
3 wanted to provide the people who cared enough to come out
4 to the public hearings the opportunity to learn a little
5 bit about the process, rather than just come up and talk
6 about things without knowing some of the detail or the
7 reasons why we do this. So that video was a new feature
8 to add.

9 I also -- I don't know if related to the
10 hearings, per se, the Zoom platform is new. We didn't
11 have that before. We have two public hearings on Zoom at
12 this time. That was definitely not something we did ten
13 years before. To allow people to not just watch but also
14 participate from -- from that platform.

15 I think all of the public hearings were
16 streamed at this time, and I don't know that they were in
17 2011. They may have been recorded, but I don't know that
18 they were streamed to be able to watch it live as it was
19 taking place. So that was new this time.

20 And the comment portal we had on the website
21 was also a new feature at this time, to allow people to
22 submit comments, and those comments are actually posted
23 so that they were viewable throughout the whole process.
24 I think the comment portal was left up until through the
25 end of the year, even following the adoption of the maps.

1 And it actually might still be there now. I'm not even a
2 hundred percent sure if it's still active, but it might
3 be still active now, not to submit, but to at least
4 review comments.

5 So all of those things were new in 2021 that we
6 did not do or have the ability to do in 2011.

7 Q Do you recall if the special session timeline
8 was similar in 2011 to 2021, the actual time in special
9 session?

10 A 2011, the special session was in the summer.
11 It was August, I believe. It was around maybe two, two
12 and a half weeks. It was a relatively short time period.
13 I mean, it was, like I said, in the summer. So 2021, we
14 were in session. Maybe -- I don't know if it was exact.
15 Maybe a little longer than that or around that time
16 period, but it was in November as opposed to August, so
17 much later in the year.

18 Q Okay. What was generally your role in the
19 redistricting process in 2011?

20 A Similar to what it was this time. I worked on
21 drawing those maps, worked with the legislators to draw
22 the -- the statewide maps for the Senate and
23 Congressional and a large portion of the House map in
24 2011.

25 Q Did you follow a similar process in drawing the

1 A Traditionally, we renumber the House plan
2 following finalizing a map. And it follows a pattern
3 from the top left, moving towards the bottom right,
4 trying to, number one, if I can maintain the same
5 district numbers that were there previously, that does
6 help with a lot of things in the counties for the
7 elections, and also for the members. But I renumber to
8 try and keep delegations in similar numbering patterns
9 and things like that as it moves through. It's not a
10 perfect science, but that is traditionally what we do in
11 the House.

12 Q So is it unusual for House District numbers to
13 change for Georgia voters following a Census and a redraw
14 of the maps?

15 A No, that's not unusual.

16 Q You talked to Mr. Canter a little bit about the
17 political data that you had available and the process of,
18 I guess, disaggregating or imputing that data to blocks.

19 Do you recall that?

20 A Yes.

21 Q And so is it correct then that if you were
22 looking at Census block data, each Census block has
23 political data in it even though it's an estimate, right?

24 A Right. As you move blocks, you would see a
25 change in not just demographic data but also in political

1 data as you move those blocks.

2 Q And when drawing the maps, you talked about
3 different meetings with groups. Let's start with the --
4 the Senate groups that you met with. Was the political
5 data for each district an important consideration for the
6 members when they were drawing the maps?

7 A Yes.

8 Q And for the House maps, was that also -- was
9 political data also an important consideration?

10 A Yes.

11 Q And for the congressional maps in that
12 leadership meeting, was political data an important
13 consideration?

14 A Yes.

15 Q Mr. Canter talked with you about the -- the
16 different factors of redistricting that the committee
17 adopted.

18 Do you recall that?

19 A Yes.

20 Q Can you just describe briefly, as a map drawer,
21 how do you go about trying to balance -- because I'm
22 assuming there is a competing interest between a lot of
23 those different factors. How do you go about approaching
24 balancing those different factors?

25 A It's very difficult, and in certain situations